

**IN THE U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS,
SHERMAN DIVISION**

MARK HAMMERVOLD

Plaintiff

V.

**DIAMONDS DIRECT USA OF
DALLAS, LLC;**

DAVID BLANK;

DIAMOND CONSORTIUM, INC.
d/b/a THE DIAMOND DOCTOR; and

**JEWELERS MUTUAL INSURANCE
COMPANY**

No. 4:20-CV-00165-ALM

**PLAINTIFF’S UNOPPOSED MOTION FOR AN EXTENSION OF TIME RE:
RESPONDING TO DEFENDANTS’ MOTIONS TO DISMISS**

Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule CV-7(e), the Plaintiff, Mark Hammervold, respectfully requests an extension until June 1, 2020 to file responses in opposition to Defendant David Blank and Diamond Consortium, Inc.'s Motion to Dismiss (Dkt. 9) and Diamonds Direct USA of Dallas, LLC's Motion to Dismiss (Dkt. 10).

Defendants David Blank and Diamond Consortium, Inc. filed a motion to dismiss on May 1, 2020. Defendant Diamonds Direct USA of Dallas filed a motion to dismiss on May 4, 2020. Pursuant to Local Rule CV-7(e), Plaintiff's responses to these Motions are currently due within fourteen (14) days, on May 15, 2020 and May 18, 2020, respectively.

The two pending motions to dismiss each involve multiple affirmative defenses and purported pleading failures, with very little overlap between the two Motions.

Plaintiff is representing himself in this case *pro se*, without the assistance of any co-counsel. The Plaintiff needs the requested extension of time due to (a) Plaintiff's increased family

and childcare obligations during the coronavirus pandemic (b) the complexity and breadth of the issues raised by Defendants, and (c) Plaintiff's other professional commitments.

Additionally, neither the Defendants, nor the efficient management of this case will be prejudiced by the extension sought herein. This Court has not yet set this case for an initial Rule 26(f) case management conference, there are no existing scheduling deadlines, and discovery has not yet begun.

This is Plaintiff's first request to extend this deadline. Prior to filing this Motion, Plaintiff conferred with Counsel for all Defendants, and *none* of the Defendants do oppose this request.

Accordingly, Plaintiff respectfully requests that the Court extend his deadline to file a response to Defendants' Motion to Dismiss by two (2) weeks, to June 1, 2020.

RESPECTFULLY SUBMITTED,

s/Mark Hammervold¹

Mark Hammervold, IL #6320744

155 S. Lawndale Ave.

Elmhurst, IL 60126

(T) 405.509.0372

(F) 615.928.2264

mark@hammervoldlaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 7, 2020, a true and correct copy of the foregoing filing was served upon all counsel of record via the Court's ECF system.

/s/ Mark Hammervold

¹ Mark Hammervold is admitted to practice in this district, but is representing himself *pro se* in this case.